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American Family Mutual Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FRED DOREMUS, individually; and
LINDA DOREMUS, individually,

Plaintiffs,

vs.

AMERICAN FAMILY MUTUAL
INSURANCE COMPANY, a foreign
entity; DOES I through X; and ROE
CORPORATIONS, XI through XX,
inclusive,

Defendants.

Case No. 2:17-CV-1034-RFB-VCF

**STIPULATION TO EXTEND
DISCOVERY DEADLINE**

[FIRST REQUEST]

The Parties, through their counsel, stipulate and request that this Court amend its Scheduling Order [Doc. 13] to extend the deadlines for discovery for ninety (90) days.

This extension is based on good cause for the following reasons:

1. The current discovery deadline is December 18, 2017.
2. Counsel for the parties have been working with each other to schedule depositions, but due to scheduling conflicts have been unable to schedule all necessary depositions within the current discovery deadline.
3. The parties agree that the best course of action is to extend discovery, dispositive motion, and pretrial order deadlines to ensure that all relevant depositions can be conducted in this matter.
4. Counsel has worked with one another to ensure other pre-trial deadlines have been met throughout the course of the case.

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1 5. With the above in mind, the Parties respectfully request to extend the following
2 deadlines:

- 3 • Discovery Deadline from December 18, 2017 to **March 18, 2018**
4 • Dispositive Motions from January 17, 2018 to **April 17, 2018**
5 • Pretrial Order from February 16, 2018 to **May 17, 2018** (unless dispositive
6 motions are filed, in which case the pretrial order shall be filed thirty days
7 after the decision of the dispositive motions or further order of the Court)

8 6. All other deadlines set forth in the Scheduling Order will remain the same.

9 7. The parties have complied with the Scheduling Order and its deadlines thus far.
10 This request is therefore the Parties' first request to extend any discovery deadlines. The
11 Parties make this request in good faith.

12 8. For above reasons, the Parties submit that good cause exists to extend discovery,
13 dispositive motions, and pretrial order, all in accordance with the accompanying Order.

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15 DATED this 29th day of November, 2017.

16 **GRAIF BARRETT & MATURA, P.C.**

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18 By: /s/ Kevin C. Barrett
19 Kevin C. Barrett
20 Attorneys for Defendant
American Family Mutual Insurance
Company

21 **HENNESS & HAIGHT**

22
23 By: /s/ Jacob S. Smith
24 Mark G. Henness, Esq.
25 Jacob S. Smith, Esq.
Attorneys for Plaintiffs Fred and Linda
Doremus

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27 IT IS SO ORDERED.

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UNITED STATES MAGISTRATE JUDGE
DATED: 12-4-2017

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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2017, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and that a copy of same was deposited for mailing, first class mail, postage prepaid, to the following:

Mark G. Henness, Esq.
Jacob S. Smith, Esq.
HENNESS & HAIGHT
8972 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Attorneys for Plaintiffs

/s/ Reanna R. Diehl